

William J. O'Shaughnessy (WJO 5256)
McCARTER & ENGLISH, LLP
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Evan R. Chesler
Richard J. Stark
David R. Marriott
CRAVATH, SWAINE & MOORE LLP
Worldwide Plaza
825 Eighth Avenue
New York, New York 10019
(212) 474-1000

Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

BROADCOM CORPORATION,	:	
	:	
Plaintiff,	:	Civil Action No. 05-3350 (MLC)
	:	
v.	:	
	:	
QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

NOTICE OF MOTION FOR ADMISSION *PRO HAC VICE*

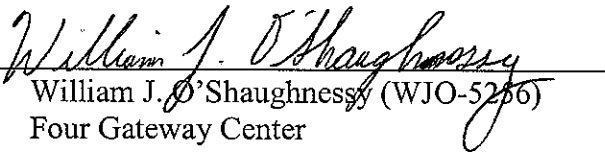
PLEASE TAKE NOTICE that on October 17, 2005 at 9:00 a.m., or as soon thereafter as counsel may be heard, defendant Qualcomm Incorporated ("defendant") will move before this Court for an order admitting Evan R. Chesler, David R. Marriott, Fabian D. Gonell, Angie K. Young and Jessie M. Gabriel of the law firm of Cravath, Swaine & Moore LLP, *pro hac vice* in this action.

In support of the motion, defendant relies on the Accompanying Affidavits of Evan R. Chesler, David R. Marriott, Fabian D. Gonell, Angie K. Young and Jessie M. Gabriel.

Defendant respectfully submits that no brief is necessary in connection with this motion, in as much as the bases of this application are set forth in the accompanying Affidavits.

Dated: September 15, 2005

McCARTER & ENGLISH, LLP

By: 
William J. O'Shaughnessy (WJO-5266)
Four Gateway Center
100 Mulberry Street
Newark, NJ 07102
(973) 622-4444

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Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

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	:	Civil Action No. 05-3350 (MLC)
Plaintiff,	:	
	:	
v.	:	
	:	
QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

ORDER GRANTING ADMISSION *PRO HAC VICE*

This matter having been opened to the Court by McCarter & English, LLP, attorneys for defendant Qualcomm Incorporated, seeking an Order admitting Evan R. Chesler, Esq., David R. Marriott, Esq., Fabian Gonell, Esq., Angie Young, Esq. and Jessie Gabriel, Esq., attorneys at law of the State of New York *pro hac vice*, and the local counsel for defendant (McCarter & English, LLP) having represented that the defendant has no objection to the entry of the within Order;

IT IS on this _____ day of _____, 2005,

ORDERED as follows:

1. Evan R. Chesler, Esq., David R. Marriott, Esq., Fabian D. Gonell, Esq., Angie K. Young, Esq. and Jessie M. Gabriel, Esq. be and they hereby are admitting *pro hac vice* to appear in this matter for all purposes on behalf of defendant Qualcomm Incorporated.

2. Evan R. Chesler, Esq., David R. Marriott, Esq., Fabian D. Gonell, Esq., Angie K. Young, Esq. and Jessie M. Gabriel, Esq. are required to abide by the Rules governing this Court, including all disciplinary rules, and to notify the Court immediately of any matter affecting their standing at the bar of any other court.

3. Evan R. Chesler, Esq., David R. Marriott, Esq., Fabian D. Gonell, Esq., Angie K. Young, Esq. and Jessie M. Gabriel, Esq. are deemed to consent to the appointment of the Clerk of the Court as agent upon whom service of process may be made for all actions against them or their firm that may arise out of their participation in this matter.

4. William J. O'Shaughnessy, Esq. of the firm of McCarter & English, LLP, and a member of the bar of this Court, has entered an appearance in this case and shall be counsel of record in accordance with Local Civil Rule 101.1(c)(3).

5. In accordance with Local Civil Rule 101.1(c)(2), Evan R. Chesler, Esq., David R. Marriott, Esq., Fabian D. Gonell, Esq., Angie K. Young, Esq. and Jessie M. Gabriel, Esq. will make payment to the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Rule 1:28-2(a).

Honorable Mary L. Cooper, U.S.D.J.

William J. O'Shaughnessy (WJO 5256)
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Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

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Plaintiff,	:	Civil Action No. 05-3350 (MLC)
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v.	:	
	:	
QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

**CERTIFICATION OF WILLIAM J. O'SHAUGHNESSY
IN SUPPORT OF *PRO HAC VICE* ADMISSION OF
EVAN R. CHESLER, DAVID R. MARRIOTT, FABIAN D. GONELL,
ANGIE K. YOUNG AND JESSIE M. GABRIEL**

WILLIAM J. O'SHAUGHNESSY, of full age, certifies as follows:

1. I am a member of the bar of the State of New Jersey and of McCarter & English, LLP, counsel for defendant Qualcomm Incorporated in this action.

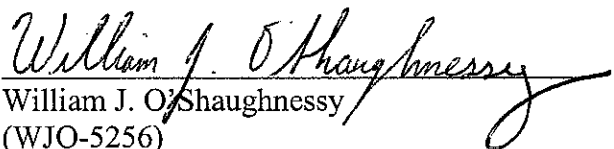
2. I make this Certification in support of the applications of Evan R. Chesler, David R. Marriott, Fabian D. Gonell, Angie K. Young and Jessie M. Gabriel for admission to the bar of this Court *pro hac vice*.

3. Affidavits from Mr. Chesler, Mr. Marriott, Mr. Gonell, Ms. Young and Ms. Gabriel in support of their applications for admission to the bar of this Court *pro hac vice* have also been submitted.

4. Mr. Chesler, Mr. Marriott, Mr. Gonell, Ms. Young and Mr. Gabriel have been advised of their obligations to comply with the Rules of Professional adopted by the New Jersey Supreme Court, and of Local Rule 101.1(c) which governs the admission of counsel *pro hac vice*.

5. Mr. Chesler, Mr. Marriott, Mr. Gonell, Ms. Young and Mr. Gabriel will be associated with attorneys from the firm of McCarter & English, LLP in the defense of this matter, and a member of McCarter & English, LLP will sign all pleadings, briefs, and other papers filed with the Court.

I certify under penalty of perjury that the foregoing is true and correct.


William J. O'Shaughnessy
(WJO-5256)

DATED: September 15, 2005

William J. O'Shaughnessy (WJO 5256)
McCARTER & ENGLISH, LLP
Four Gateway Center
100 Mulberry Street
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Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

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Plaintiff,	:	Civil Action No. 05-3350 (MLC)
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v.	:	
	:	
QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

STATE OF NEW YORK)
) ss.
COUNTY OF NEW YORK)

**AFFIDAVIT OF DAVID R. MARRIOTT IN SUPPORT OF
ADMISSION *PRO HAC VICE***

David R. Marriott, being duly sworn, deposes and says:

1. I am a member of the law firm of Cravath, Swaine & Moore LLP. My business address is Worldwide Plaza, 825 Eighth Avenue, New York, New York 10019-7475. I make this Affidavit in support of the motion of defendant Qualcomm Incorporated ("Qualcomm") to admit me *pro hac vice* for purposes of representing them in this matter.

2. I am a member in good standing of the bar of the State of New York, the state of which I am a resident and in which I principally practice law. There are no disciplinary proceedings presently pending against me, and no discipline has previously been imposed upon me.

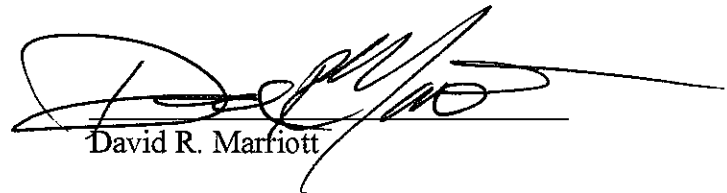
3. I am a 1994 graduate of the New York University School of Law. I was admitted to practice in the State of New York in 1995 and the State of Utah in 1996. I am also admitted to practice before the United States Supreme Court (2001), the United States Court of Appeals for the First Circuit (2000), the United States Court of Appeals for the Second Circuit (1997), the United States Court of Appeals for the Sixth Circuit (1995), the United States Court of Appeals for the Ninth Circuit (1995), the United States Court of Appeals for the Tenth Circuit (1996), the United States Court of Appeals for the Eleventh Circuit (1996), the United States Court of Appeals for the Federal Circuit (2001), the United States Court of Appeals for the D.C. Circuit (2001), the United States District Court for the Southern District of New York (1996), the United States District Court for the Eastern District of New York (1996), the United States District Court for the Eastern District of Michigan (1997), the United States District Court for the Western District of Michigan (1995), the United States District Court for the District of Utah (2003), the United States District Court for the District of Columbia, and the United States District Court for the Northern District of California (1995). I am currently and have always been a member in good standing in these Courts.

4. My principal practice involves civil and commercial litigation.

5. Our law firm is counsel for Qualcomm and we have represented Qualcomm in other lawsuits, and Qualcomm has requested that we represent it in all aspects of this case, including trial, and I accordingly request that the Court admit me *pro hac vice* for these purposes.

6. I am familiar with and, if admitted, will abide by the Local Rules of this Court. I am associated in this matter with New Jersey counsel, William J. O'Shaughnessy, Esq. of the law firm of McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102.

7. I will make any required payment to the New Jersey Lawyers' Fund for Client Protection.



David R. Marriott

Sworn and subscribed to before me,
a notary public of the State of New York,
this 15th day of September, 2005.



ROBERT B. ZWILLICH
Notary Public, State of New York
No. 31-4630959
Qualified in New York County
Commission Expires October 31, 2006

William J. O'Shaughnessy (WJO 5256)
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Evan R. Chesler
Richard J. Stark
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Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

BROADCOM CORPORATION,	:	
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Plaintiff,	:	Civil Action No. 05-3350 (MLC)
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v.	:	
	:	
QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

STATE OF NEW YORK)
) ss.
COUNTY OF NEW YORK)

**AFFIDAVIT OF EVAN R. CHESLER IN SUPPORT OF
ADMISSION *PRO HAC VICE***

Evan R. Chesler, being duly sworn, deposes and says:

1. I am a member of the law firm of Cravath, Swaine & Moore LLP. My business address is Worldwide Plaza, 825 Eighth Avenue, New York, New York 10019-7475. I make this Affidavit in support of the motion of defendant Qualcomm Incorporated ("Qualcomm") to admit me *pro hac vice* for purposes of representing them in this matter.

2. I am a member in good standing of the bar of the State of New York, the state of which I am a resident and in which I principally practice law. There are no disciplinary proceedings presently pending against me, and no discipline has previously been imposed upon me.

3. I am a 1975 graduate of the New York University School of Law. I was admitted to practice in the State of New York in 1976. I am also admitted to practice before the New York Appellate Division (1976), the United States District Court for the Southern District of New York (1976), the United States District Court for the Eastern District of New York (1982), the United States District Court for the Northern District of California (1982), the United States District Court for the District of Connecticut (1988), the United States District Court for the District of Columbia (2001), the United States District Court for the District of Colorado (2000), the United States District Court for the Northern District of New York (2001), the United States Court of Appeals for the First Circuit (1992), the United States Court of Appeals for the Second Circuit (1982), the United States Court of Appeals for the Third Circuit (1991), the United States Court of Appeals for the Fifth Circuit (1994), the United States Court of Appeals for the Ninth Circuit (1997), the United States Court of Appeals for the Federal Circuit (1993), and the United States Supreme Court (1982).


4. My principal practice involves civil and commercial litigation.

5. Our law firm is counsel for Qualcomm and we have represented Qualcomm in other lawsuits, and Qualcomm has requested that we represent it in all aspects of this case, including trial, and I accordingly request that the Court admit me *pro hac vice* for these purposes.

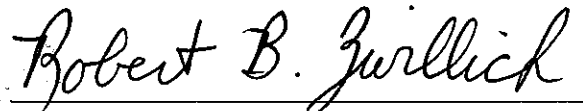
6. I am familiar with and, if admitted, will abide by the Local Rules of this Court. I am associated in this matter with New Jersey counsel, William J. O'Shaughnessy, Esq. of the

law firm of McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102.

7. I will make any required payment to the New Jersey Lawyers' Fund for Client Protection.


Evan R. Chesler

Sworn and subscribed to before me,
a notary public of the State of New York,
this 15th day of September, 2005.



ROBERT B. ZWILLICH
Notary Public, State of New York
No. 31-4630959
Qualified in New York County
Commission Expires October 31, 2006

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Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

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v.	:	
	:	
QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

STATE OF NEW YORK)
) ss.
COUNTY OF NEW YORK)

**AFFIDAVIT OF FABIAN D. GONELL IN SUPPORT OF
ADMISSION *PRO HAC VICE***

Fabian D. Gonell, being duly sworn, deposes and says:

1. I am associated with the law firm of Cravath, Swaine & Moore LLP. My business address is Worldwide Plaza, 825 Eighth Avenue, New York, New York 10019-7475. I make this Affidavit in support of the motion of defendant Qualcomm Incorporated ("Qualcomm") to admit me *pro hac vice* for purposes of representing them in this matter.

2. I am a member in good standing of the bar of the State of New York, the state of which I am a resident and in which I principally practice law. There are no disciplinary proceedings presently pending against me, and no discipline has previously been imposed upon me.

3. I am a 1999 graduate of the Fordham University Law School. I was admitted to practice in the State of New York in 2000. I am also admitted to practice before the United States District Court for the Eastern District of New York (2005), and the United States District Court for the Southern District of New York (2002). I am currently and have always been a member in good standing in these Courts.

4. My principal practice involves civil and commercial litigation.

5. Our law firm is counsel for Qualcomm and we have represented Qualcomm in other lawsuits, and Qualcomm has requested that we represent it in all aspects of this case, including trial, and I accordingly request that the Court admit me *pro hac vice* for these purposes.

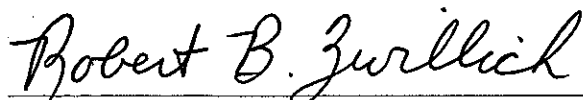
6. I am familiar with and, if admitted, will abide by the Local Rules of this Court. I am associated in this matter with New Jersey counsel, William J. O'Shaughnessy, Esq. of the law firm of McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102.

7. I will make any required payment to the New Jersey Lawyers' Fund for Client Protection.



Fabian D. Gonell

Sworn and subscribed to before me,
a notary public of the State of New York,
this 15th day of September, 2005.



ROBERT B. ZWILLICH

ROBERT B. ZWILLICH
Notary Public, State of New York
No. 31-4630959
Qualified in New York County
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Attorneys for Defendant Qualcomm Incorporated

UNITED STATES DISTRICT COURT
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BROADCOM CORPORATION,	:	
	:	Civil Action No. 05-3350 (MLC)
Plaintiff,	:	
	:	
v.	:	
	:	
QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

STATE OF NEW YORK)
) ss.
COUNTY OF NEW YORK)

**AFFIDAVIT OF ANGIE K. YOUNG IN SUPPORT OF
ADMISSION *PRO HAC VICE***

Angie K. Young, being duly sworn, deposes and says:

1. I am associated with the law firm of Cravath, Swaine & Moore LLP. My business address is Worldwide Plaza, 825 Eighth Avenue, New York, New York 10019-7475. I make this Affidavit in support of the motion of defendant Qualcomm Incorporated ("Qualcomm") to admit me *pro hac vice* for purposes of representing them in this matter.

2. I am a member in good standing of the bar of the State of New York, the state of which I am a resident and in which I principally practice law. There are no disciplinary proceedings presently pending against me, and no discipline has previously been imposed upon me.

3. I am a 2003 graduate of the University of Chicago Law School. I was admitted to practice in the State of New York in 2004. I am currently and have always been a member in good standing.

4. My principal practice involves civil and commercial litigation.

5. Our law firm is counsel for Qualcomm and we have represented Qualcomm in other lawsuits, and Qualcomm has requested that we represent it in all aspects of this case, including trial, and I accordingly request that the Court admit me *pro hac vice* for these purposes.

6. I am familiar with and, if admitted, will abide by the Local Rules of this Court. I am associated in this matter with New Jersey counsel, William J. O'Shaughnessy, Esq. of the law firm of McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102.

7. I will make any required payment to the New Jersey Lawyers' Fund for Client Protection.


Angie K. Young

Sworn and subscribed to before me,
a notary public of the State of New York,
this 15th day of September, 2005.



ROBERT B. ZWILLICH
Notary Public, State of New York
No. 31-4630959
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Attorneys for Defendant Qualcomm Incorporated

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QUALCOMM INCORPORATED,	:	
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Defendant.	:	

STATE OF NEW YORK)
) ss.
COUNTY OF NEW YORK)

**AFFIDAVIT OF JESSIE M. GABRIEL IN SUPPORT OF
ADMISSION *PRO HAC VICE***

Jessie M. Gabriel, being duly sworn, deposes and says:

1. I am associated with the law firm of Cravath, Swaine & Moore LLP. My business address is Worldwide Plaza, 825 Eighth Avenue, New York, New York 10019-7475. I make this Affidavit in support of the motion of defendant Qualcomm Incorporated ("Qualcomm") to admit me *pro hac vice* for purposes of representing them in this matter.

2. I am a member in good standing of the bar of the State of New York, the state of which I am a resident and in which I principally practice law. There are no disciplinary proceedings presently pending against me, and no discipline has previously been imposed upon me.

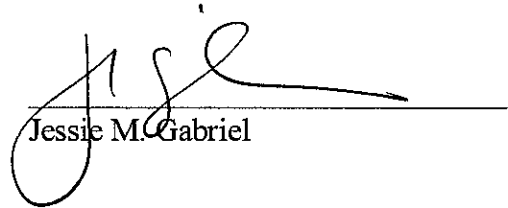
3. I am a 2004 graduate of the University of Michigan Law School. I was admitted to practice in the State of New York in 2005. I am currently and have always been a member in good standing.

4. My principal practice involves civil and commercial litigation.

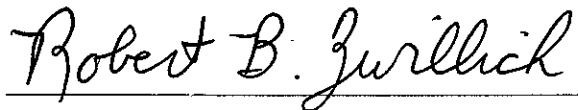
5. Our law firm is counsel for Qualcomm and we have represented Qualcomm in other lawsuits, and Qualcomm has requested that we represent it in all aspects of this case, including trial, and I accordingly request that the Court admit me *pro hac vice* for these purposes.

6. I am familiar with and, if admitted, will abide by the Local Rules of this Court. I am associated in this matter with New Jersey counsel, William J. O'Shaughnessy, Esq. of the law firm of McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102.

7. I will make any required payment to the New Jersey Lawyers' Fund for Client Protection.


Jessie M. Gabriel

Sworn and subscribed to before me,
a notary public of the State of New York,
this 15th day of September, 2005.



ROBERT B. ZWILLICH
Notary Public, State of New York
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	:	
QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

CERTIFICATION OF SERVICE

RICHARD HERNANDEZ, of full age, certifies as follows:

1. I am an attorney at law of the State of New Jersey and am associated with the firm of McCarter & English, LLP, attorneys for defendant Qualcomm Incorporated.
2. On September 16, 2005, I caused to be delivered by regular mail copies of the Notice of Motion for Admission *Pro Hac Vice*, Certification of William J. O'Shaughnessy in Support of Motion for Admission *Pro Hac Vice*, Affidavits of Evan R. Chesler, David R.

Marriott, Fabian D. Gonell, Angie K. Young and Jessie M. Gabriel in Support of Admission *Pro Hac Vice*, and a proposed form of Order granting Admission *Pro Hac Vice* to the following:

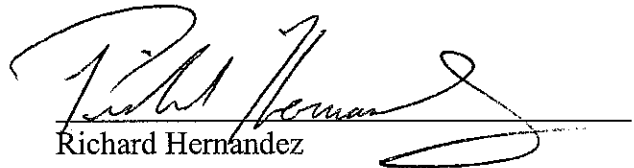
David S. Stone, Esq.
Boies, Schiller & Flexner LLP
150 John F. Kennedy Parkway
Short Hills, New Jersey 07078

George S. Cary, Esq.
Cleary Gottlieb Steen & Hamilton LLP
2000 Pennsylvania Avenue, NW
Washington, DC 20006

David Boies, Esq.
Boies, Schiller & Flexner LLP
570 Lexington Avenue
New York, New York 10022

Anne Patterson, Esq.
Riker Danzig Scherer Hyland & Perretti LLP
Headquarters Plaza 1 Speedwell Avenue
Morristown, New Jersey 07962

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.


Richard Hernandez

DATED: September 15, 2005